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THE HONORABLE
J. FREDERICK MOTZ
DEPUTY

The Honorable J. Frederick Motz
 United States District Judge
 U.S. Court House
 101 W. Lombard Street
 Baltimore, Maryland 21201

Re: Liberty Marina v. American Alliance Ins. Co.
 U.S. District Court for the District of Maryland
 Civil Action No. JFM-01-2016
 Our File No.: 6313-14

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Dear Judge Motz:

I am writing to present a joint request for modification of the Scheduling Order in the above case.

The plaintiff's expert designation deadline (Rule 26(a)(2)) was February 7, 2002. Soon after receiving the plaintiff's designation, the defendant requested a date to depose the plaintiff's expert. Unfortunately, the earliest date we could depose the plaintiff's expert is April 5, 2002. The defendant's expert designation deadline is March 18, 2002. Therefore, the deposition could not be taken before the current deadline.

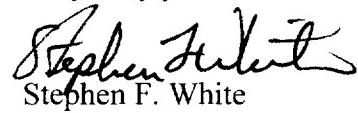
This has been discussed between counsel (myself and Michael Wiggins, Esq.). We have jointly agreed to request that the Schedule be modified as follows. This would not affect the current Discovery Deadline or the current Motions Deadline:

Defendant's Rule 26(a)(2)	from 3/18/02 to 4/19/02
Plaintiff's Rebuttal 26(a)(2)	from 4/01/02 to 5/03/02
Rule 26(e) Supplementation	from 4/15/02 to 5/17/02
Discovery Deadline	unchanged 6/01/02
Dispositive Motions	unchanged 7/01/02

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Your consideration of this joint request is greatly appreciated.

Very truly yours,


Stephen F. White

Approved/Denied:

Dated: March 14, 2002

cc:

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